

## **Model Disclosure Form Commentary**

### **Section A.**

- The lender does not need to fill in or include both boxes, choose the appropriate box for the loan product. Fixed loans will choose and include the first box, labeled “Current Fixed Interest Rate,” and variable loans will choose and include the second box, labeled “Variable Interest Rate Range.”
- If you have a variable interest rate, to ascertain your “interest rate range” please use the interest rate data from the past calendar year, e.g. January 1, 2008 – December 31, 2008. This variable interest rate range only needs to be updated once a year, on January 1 of the new calendar year.
- If a lender has multiple loan products or tiered loan pricing in lieu of having multiple disclosures the lender may choose to disclose the interest rate ranges for multiple products on one disclosure form.

### **Section B. Loan Fee Information**

- “Readily ascertainable” does include post-origination fees such as phone pay fees and late fees. The term includes any fee that the lender currently may charge a borrower. If the fee is subject to change, please do as the form requests and note it in the disclosure.

### **Section C. Co-Borrower Requirements**

- No additional comments at this time.

### **Section D. Repayment of Loan Information**

- No additional comments at this time.

### **Section E. Deferment or Forbearance**

- The lender may reiterate what is in the promissory note/credit agreement.

### **Section F. Example of Total Cost of the Loan**

- No additional comments at this time.

### **Section G. Additional Terms and Conditions**

- No additional comments at this time.

## **Section H. Comparison of Federal and Private Student Loans**

- No additional comments at this time.

## **Section I. Consequences of Loan Default**

- Identifying the events of default on the promissory note is sufficient and constitutes compliance with this form.

## **Section J. Lender/Service Contact Information**

- No additional comments at this time.